

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN RE: ) NO: 23-40889  
 ) CHAPTER 13  
Patricia Ruhmann, ) Hearing Date: 6/8/2023  
 ) Hearing Time: 10:00 a.m.  
Debtor. ) Courtroom: 7 South  
TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

Comes now Diana S. Daugherty, Standing Chapter 13 Trustee,  
and states as follows:

1. According to amended claim #1 of the IRS, Debtor did not file  
U.S. and State income tax returns for 2019, 2021 or 2022. [11  
U.S.C. § 1325(a)(9); § 1308]

a) Debtor testified that she filed 2019, 2020, 2021 and 2022 U.S.  
and State income tax returns approximately a week prior to the  
4/12/23 meeting of creditors.

b) The Trustee received copies of 2019, 2020, 2021 or 2022 U.S.  
and State income tax returns on 4/25/23.

2. The first amended plan is not feasible in that:

a) It will not pay priority claims in full.

b) Based on presently filed claims and scheduled debts, the base  
of the first amended plan is approximately \$9,646 short of being  
feasible.

3. Debtor lacks sufficient income to fund the first amended plan.

a) Schedule I - Schedule J = \$165.48/month.

b) Plan payment = \$350.00/month over the final 52 months of the  
first amended plan.

**WHEREFORE**, the Trustee prays that the Court deny confirmation of Debtor's First Amended Chapter 13 Plan; and for such other relief as this Honorable Court deems necessary and just under the circumstances.

Respectfully Submitted,

/s/ Joseph M. Wilson  
Diana S. Daugherty  
Chapter 13 Trustee  
Joseph M. Wilson  
FED#51849MO; MO#51849  
Attorney For Trustee  
P.O. Box 430908  
St. Louis, MO 63143  
(314) 781-8100  
(314) 781-8881 (fax)  
E-Mail: trust33@ch13stl.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above Trustee's Objection was filed electronically with the United States Bankruptcy Court on the 16th day of May, 2023, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

The undersigned hereby certifies that the above Trustee's Objection was filed electronically with the United States Bankruptcy Court and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below, on the 16th day of May, 2023:

Patricia Ruhmann  
9811 Eastbrook Dr.  
St. Louis, MO 63114

/s/ Joseph M. Wilson